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12 Attorneys for Defendants
ELMER WHEELER and SANNA LIGOURI

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

17 TIMPHONY L. WALKER,
18 Plaintiff,
19 vs.

20 SANTA CLARA COUNTY DEPARTMENT OF
CORRECTION OFFICERS WHEELER,
21 LIGOURI, CORRECTIONAL SERGEANT
CORSO, CORRECTIONAL LIEUTENANT FRED
22 HINK, RICHARD WITTENBERG-COUNTY
EXECUTIVE, JIM BABCOCK-CHIEF OF
23 CORRECTIONS, SANTA CLARA COUNTY
DEPARTMENT OF CORRECTION, SANTA
24 CLARA BOARD OF SUPERVISORS, AND
DOES, I-V.,
25 Defendants.

CASE NO.: C-04-00022 VRW (PR)

JOINT STIPULATION AND
~~PROPOSED~~ PROTECTIVE ORDER

Complaint Filed: January 6, 2004

COBLENTZ, PATCH, DUFFY & BASS LLP
ONE FERRY BUILDING, SUITE 200, SAN FRANCISCO, CA 94111-4213
(415) 391-4800 • FAX (415) 989-1663

1 Plaintiff Timphony Walker, by and through his attorney of record, and Defendants Elmer
2 Wheeler and Sanna Liguori, by and through their attorney of record, stipulate to the following
3 terms and conditions respecting specifically designated and/or marked documents and items
4 produced in this litigation:

5 1. It is agreed that Plaintiff will restrict access to all documents and items – marked
6 "DOC CONFIDENTIAL" by the County – to the following individuals: Plaintiff, Plaintiffs'
7 attorneys (including staff), and litigation consultants;

8 2. Nothing contained herein shall prohibit counsel for Plaintiff and Defendants from
9 using or referring to the marked documents or items in motion papers or pleadings filed with the
10 Court in this action. If marked documents or items subject to this protective order are contained
11 within or attached to any pleading, the County will have the right to move that any pleading be
12 sealed pursuant to Court Order;

13 3. Where permitted by the rules of evidence, the marked documents or items may be
14 exhibited to witnesses during the trial or pretrial proceedings in this action provided, however,
15 that to the extent that the transcript of any trial or pretrial proceeding or the exhibits incorporate
16 or reference the documents or items, the transcript and/or exhibits may be sealed in accordance
17 with the Court's rules and procedures upon application by the County;

18 4. Upon case disposition, Plaintiff agrees to dispose of all of the documents and items
19 (and all duplicates and/or copies thereof) or return same to the County;

20 5. If there is any unauthorized disclosure of any documents or items subject to this
21 Order by any person, said person may be subject to sanctions and civil contempt for violation of
22 this Order, in accordance with the procedures of the Court; and

23 6. This Order is subject to modification pursuant to written stipulation between the
24 parties and/or appropriate motion procedures.


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1 Dated: October 16, 2006

COBLENTZ, PATCH, DUFFY & BASS LLP

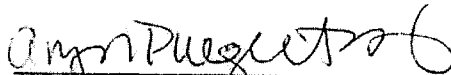
2
3 By:


SABRINA L. FEVE
Attorneys for Plaintiff
TIMPHONY L. WALKER


4
5
6 Dated: October 16, 2006

ANN MILLER RAVEL
County Counsel

7
8
9 By:


ARYN P. HARRIS
Lead Deputy County Counsel
Attorneys for Defendants
Officers Wheeler and Liguori

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12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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15 
VAUGHN WALKER
U.S. District Court Judge

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17 Dated: October 25, 2006